



Attn: Antitrust Division
Office of Attorney General
One Ashburton Place, 18th Floor
Boston, MA 02108

October 21, 2014

Dear Justice Sanders:

As you review issues related to the filing of the Attorney General's Consent Agreement with Partners Healthcare, I respectfully ask you to consider a different perspective.

As a registered nurse of almost forty years, I have witnessed the changes in healthcare in the Commonwealth both as a care provider and a consumer. Competition is an unwavering standard in a democratic society, even in health care, and especially in a state such as Massachusetts.

Detractors of the Consent Agreement fail to mention that over the years, while tertiary hospitals were increasing their market share in the community, especially in affluent communities, and ultimately raising the cost of healthcare, community hospitals were losing patient volume and in some cases closing their doors. Boston Regional Medical Center, Choate Hospital, Symmes Hospital, and Malden Hospital were all casualties of these changes in health care utilization.

The formerly unrestricted competition in Massachusetts healthcare has changed the overall landscape in the community forever. Over the past twenty years, both for-profit and not-for-profit tertiary providers such as Partners Healthcare, Beth Israel Deaconess, Children's Hospital, Steward Health Care and Lahey Health have all expanded and directly impacted community hospitals by building and heavily promoting primary care sites in the community. And while they expanded farther and farther from Boston, these health systems have spent the majority of their community dollars at their flagship locations. The current Partners agreement before you changes that practice and ensures that money be spent in the community to benefit residents of the community.

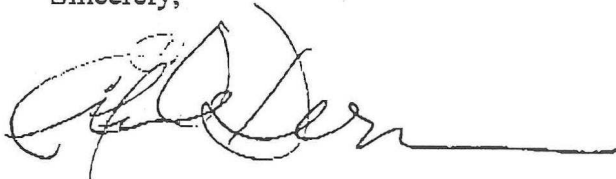
I work at Hallmark Health System and as a long-term employee have a biased view, but despite the rhetoric of the national economists and the Health Policy Commission that we are not in dire straits-I believe that Hallmark Health System is fighting for its life. A community health system cannot stand alone in the current health care environment and remain competitive. Hallmark Health System is no exception. Now is not the time to close Pandora's Box by curtailing hospital mergers and acquisitions- Pandora is already out of the box!

What we as consumers can do today is manage Pandora. In my experience, the best way to control costs and encourage fairer competitive practices is to institute rate setting across health care, and not just at Partners Healthcare. Criteria for consumer usage should also be developed to ensure that regular quality health services are offered and promoted locally at a fair price. If consumers choose to travel to a tertiary center for these regular health services- they should pay a higher premium for this choice. In the affiliation agreement between Partners Healthcare and Hallmark Health System, a population health model will institutionalize these cost-savings practices.

While we wait for the legal decisions to be made regarding the Partners Healthcare affiliation, Lahey Health has acquired Winchester Hospital and other mergers and affiliations such as those between Lowell General Hospital and Tufts Medical Center are quickly moving forward. I do not believe our System can withstand another year of this overpowering uncertainty and intense scrutiny. Hallmark Health is needed by residents in the community; the testimony at the recent public health hearings strongly confirmed that opinion.

In closing, I respectfully ask you to consider my perspective- hard won over thirty-nine years in health care. In the landmark decision before you, please consider the views from the front-line of healthcare as strongly as those from the towers of academia and the politicians running for office.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Eileen Dern', followed by a long horizontal line extending to the right.

Eileen Dern

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